

The Honorable Tana Lin

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

FEDERATED MUTUAL INSURANCE  
COMPANY,

Plaintiff,

v.

NICHOLAS M. WALL,

Defendant.

NO. 3:22-cv-05023-TL

STIPULATION TO STAY DISCOVERY  
PENDING ORDER ON MOTION FOR  
SUMMARY JUDGMENT

Note on Motion Calendar: August 23, 2022

Plaintiff Federated Mutual Insurance Company and Defendant Nicholas M. Wall request a stay of discovery pending the Court's order on the parties' pending cross-motions for summary judgment (Dkt. Nos. 13 and 15).

As indicated in the Parties Fed. R. Civ. P. 26(f) report (Dkt. No. 10), the parties believe this matter can be resolved through the submitted cross-motions for summary judgment without need for discovery. In the interest of time and economy, the parties respectfully ask that discovery be stayed pending the Court's ruling on the parties' pending cross-motions for summary judgment.

If necessary following the issuance of a ruling on the pending cross-motions for summary judgment, the parties will confer and submit a proposed amended scheduling order.

Respectfully submitted August 23, 2022.

BETTS, PATTERSON & MINES, P.S.

FRIEDMAN | RUBIN PLLP

By: /s Joseph D. Hampton

By: /s Michael A. Angiulo

By: /s Danielle N. McKenzie

By: /s David P. Roosa

Joseph D. Hampton, WSBA #15297

Michael A. Angiulo, WSBA #58343

Danielle N. McKenzie, WSBA #49715

David P. Roosa, WSBA #45266

Betts, Patterson & Mines, P.S.

Friedman | Rubin PLLP

One Convention Place, Suite 1400

1109 – 1<sup>st</sup> Avenue, Suite 501

701 Pike Street

Seattle, WA 98101

Seattle, WA 98101

mangiulo@friedmanrubin.com

jhampton@bpmlaw.com

droosa@friedmanrubin.com

dmckenzie@bpmlaw.com

Phone: 206-292-99988

Phone: (206) 501-4446

Fax: 206-343-7053

Fax: (206) 623-0794

Attorneys for Plaintiff Federated Mutual  
Insurance Company

Attorneys for Defendant/Counterclaimant  
Nicholas M. Wall

MEAGHER & GEER, PLLP

By: /s Thomas H. Crouch

Thomas H. Crouch, *pro hac vice*

Meagher & Geer, PLLP

16767 North Perimeter Drive, Suite 210

Scottsdale, AZ 85260

tcrouch@meagher.com

480-624-8568

Attorneys for Plaintiff Federated Mutual  
Insurance Company

**ORDER**

IT IS SO ORDERED.

This 24th day of August 2022.



Tana Lin

United States District Judge